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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PARTMINER INFORMATION SERVICES,
INC.,

Plaintiff,

-vs-

AVNET, INC., THOMAS CASEY REED,
JOHN KENNETH SHARPE, and NEIL R.
VANEK,

Defendants.

07 Civ. 11482 (LMM)

**AFFIDAVIT OF ANDREW
SBRAVATI IN SUPPORT OF
MOTION FOR PRELIMINARY
INJUNCTION AND EXPEDITED
DISCOVERY**

STATE OF COLORADO)

ss:

COUNTY OF ARAPAHOE)

ANDREW SBRAVATI, being duly sworn, deposes and says:

1. I am over the age of 18 and the matters that I state in this affidavit are based on my personal knowledge and the best of my recollection.

2. I worked for Avnet, Inc.'s Premiere Division ("Avnet") from June 2006 until February, 2007, at its sales office located at 12600 E. Arapahoe Road in Englewood, Colorado.

3. While at Avnet, I was a member of Avnet's sales team, which included Casey Reed, Neil Vanek and Kenney Sharpe. Casey Reed ran the team and we reported directly to him.

4. Mr. Reed, Mr. Vanek and Mr. Sharpe all used to work for Avnet's competitor, PartMiner Information Services, Inc. ("PartMiner").

5. I participated in several discussions around the Avnet office concerning the source of the sales leads on which Reed, Sharpe and Vanek focused. Sales leads identify persons or entities that are potentially interested in purchasing a business' service. Although they were asked about the source at several sales meetings, each refused to reveal such information. Even more curiously, Avnet's customer databases usually provide information concerning the source of leads, but no such information was included for most of Reed's, Sharpe's and Vanek's leads.

6. I also participated in several discussions around the Avnet office wherein it was claimed that Mr. Reed had a list of all PartMiner customer information. Marc Brewer, the first Avnet sales person hired after Reed, Vanek, and Sharpe came over from PartMiner, told me on several occasions that he and Steve Burrell, an Avnet sales engineer, found the list on Mr. Reed's desk. Mr. Brewer even took me into Mr. Reed's office and showed me a stack of papers that he told me was the PartMiner customer list. Mr. Burrell also told me that the PartMiner customer list was how Reed, Sharpe and Vanek made their money.

7. Mr. Reed held regular sales meetings where he would often make statements to the effect of, "We know all of PartMiner's customers and we are going to take them away and

put PartMiner out of business.” Mr. Reed further stated that his sales model was to go after PartMiner customers, as opposed to trying to get new business from Avnet customers.

8. I sat in on approximately 20 customer calls made by Mr. Vanek and Mr. Sharpe, and would overhear customer calls made by them every day because our office was very small. Mr. Vanek and Mr. Sharpe almost always used the same script, which would begin with the statement that, “We used to work for PartMiner, but left because of data integrity issues.” They would further state that, “We have 19 million parts in our database with 500 engineers and PartMiner has 89 million parts with 80 engineers. PartMiner makes up part numbers to get its numbers that high.” These statements were false.

9. I heard Mr. Reed, Mr. Vanek and/or Mr. Sharpe make at least one of these false statements about PartMiner to a customer nearly every day I worked at Avnet, and I participated in a number of sales calls to PartMiner customers where the same statements were used.

10. Mr. Reed used a customer relationship management program, known as CARES, that he claimed to have developed while at Avnet.

11. I recently resigned from Avnet and joined PartMiner. I am a Director of Enterprise Sales for PartMiner. Since joining PartMiner, I have come to learn and realized that the CARES program that Mr. Reed used is virtually identical to the program used by PartMiner, which is also called CARES.


ANDREW SBRAVATI

Sworn to before me this
12th day of December, 2007


Notary Public

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